

United States District Court

SOUTHERN

DISTRICT OF
McALLEN DIVISION

TEXAS

UNITED STATES OF AMERICA

V.

Reynaldo Hovey

YOB:

PRINCIPAL

1982

United States

CRIMINAL COMPLAINT

Case Number:

M-19-0116 -M

United States District Court
Southern District of Texas
FILED

JAN 16 2019

Clark of Court

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about January 15, 2019 in Hidalgo County, in the Southern District of Texas defendants(s) did,
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Irene Jaime Orellana-Reyes, a citizen and national of El Salvador, and Angel Maria Romero-Navarrete, a citizen and national of Honduras, along with two (2) other undocumented aliens, for a total of four (4), who had entered the United States in violation of law, did knowingly transport, or move or attempt to transport said aliens in furtherance of such violation of law within the United States, that is, from a location near Los Ebanos, Texas to the point of arrest near Sullivan City, Texas,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONY

I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On January 15, 2019, a Border Patrol Agent assigned to line watch duties, was informed by a concerned citizen that a tan GMC truck had picked up five possible undocumented aliens near the cemetery in Los Ebanos, Texas. The city of Los Ebanos is commonly known for alien and narcotic smuggling.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Approved by David A. Lindemann
1/16/19

Julio C. Peña
Signature of Complainant

Sworn to before me and subscribed in my presence,

Julio C. Peña Senior Patrol Agent
Printed Name of Complainant

January 16, 2019

Date

at McAllen, Texas
City and State

J Scott Hacker, U. S. Magistrate Judge
Name and Title of Judicial Officer

Signature of Judicial Officer

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-19-0116 -M

RE: Reynaldo Hovey

CONTINUATION:

An Agent near El Faro Road recalled seeing a vehicle that matched the description, traveling northbound on the same road. The Border Patrol Agent informed other agents via his service radio and proceeded to drive towards Highway 83 in an attempt to locate the tan GMC truck. A Department of Public Safety Trooper (DPS) near the area was also notified of the possible smuggling attempt and responded. Shortly thereafter, the Trooper encountered a vehicle matching the description and followed the truck to a residence located at 224 Fresno Street in Sullivan City, Texas.

The Trooper followed the suspected vehicle as it parked in the open driveway of the residence. The Trooper observed the driver, later identified as Reynaldo Hovey, exit the vehicle and walk towards the back of the residence. The Trooper, along with a Border Patrol Agent made their way to the front door of the residence and knocked on the door. The Trooper heard a voice from the back of the house and observed Hovey talking on his cell phone. The Trooper questioned Hovey regarding his presence at the residence. Hovey stated that it was his friend's house and he was waiting for him. During this time, the Trooper saw in plain sight several subjects laying in the bed of the GMC truck. One additional subject was found hiding on the floorboard of the passenger side seat.

Agents conducted an immigration inspection on the four subjects found in the truck and determined all were illegally present without proper documentation to remain in the United States.

Border Patrol Agents were able to make contact with the owner of the residence. The owner stated he did not know Hovey and did not approve of him being on the property.

Hovey, a United States Citizen, was read his Miranda Rights and placed under arrest. Hovey and the four undocumented aliens were transported to the McAllen Border Patrol Station for processing.

PRINCIPAL STATEMENT:

Reynaldo Hovey was read his Miranda Rights. He understood however, he refused to provide a sworn statement.

MATERIAL WITNESS STATEMENTS:

Irene Jaime Orellana-Reyes and Angel Maria Romero-Navarette were read their Miranda rights. Both understood their rights and agreed to provide a sworn statement.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-19-0116 -M

RE: Reynaldo Hovey

CONTINUATION:

Orellana, a citizen of El Salvador, stated that he made his smuggling arrangements and was to pay a total of \$12,500 with an amount of \$6,250 being paid up front. Orellana stated that he crossed the river on an inflatable raft along with four (4) other subjects. After crossing the river, they were instructed to run towards a cemetery where they would get picked up by a grey in color truck. Orellana stated that once he saw the truck, he boarded the passenger side after being told by the driver to get in. Orellana stated that the rest of the subjects were in the bed of the truck when they drove off. Orellana claimed that the driver was on the phone while driving, and that he overheard the driver being told to go to a residence where he would be received after knocking on the door. Once at the residence, Orellana claims that the driver exited the vehicle and told him to stay put and keep quiet.

Through a photo lineup, Orellana was able to positively identify Hovey as the driver of the vehicle.

Romero, a citizen of Honduras, stated a guide smuggled him and three other people across the river on a raft. Romero stated the guide had given them instructions to load into a grey truck. Romero ran on a road until he saw the pickup truck that matched the description of the guide's instructions. Romero stated the driver gave them hand signals to get in the bed of the pickup truck. Romero stated he and two others got in the bed of the truck and the fourth person got inside the pickup truck. The truck then drove off and stopped at a location shortly after. The driver then got off and instructed them not to get off, not to move, and not to make noise. Romero stated they were arrested shortly after.